



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

May 21, 1998

Gordon A. Elliott, Treasurer
Friends of Roy Blunt
P.O. Box 278
Strafford, MO 65757

Identification Number: C00304758

Reference: Year End Report (7/1/97-12/31/97)

Dear Mr. Elliott:

On April 21, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your May 18, 1998 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-When filing your committee's reports it is important to note the distinction between in-kind contributions and staff advances. An in-kind contribution is a contribution of goods, services or property offered free or at less than the usual and normal charge. When an in-kind contribution is made the contributor does not expect to be reimbursed. An in-kind contribution is reported in the following manner: the value of the in-kind is itemized as a contribution on Schedule A and as an operating expenditure on Schedule B. The value of the in-kind contribution is added to the contribution and expenditure total to avoid deflating the cash-on-hand. The reporting of an in-kind contribution is done on the Report covering the period in which it is made.

When the candidate, a volunteer, or a committee staff member uses his or her personal funds or personal credit card to pay a vendor for a campaign expense and is later reimbursed by the committee, a Staff Advance is made and different reporting procedures are used. In this case the expense advanced constitutes a debt and should be reported in the